



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

August 1, 2017

Thomas J. Ebbert
Manager, Remediation
PPG Industries, Inc.
440 College Park Drive
Monroeville, PA 15146

Re: Riverside Industrial Park Superfund Site, Newark, New Jersey: Administrative Settlement Agreement and Order on Consent For Remedial Investigation and Feasibility Study - CERCLA Docket No. 02-2014-2011

Dear Mr. Ebbert:

The U.S. Environmental Protection Agency (EPA) has reviewed PPG Industries, Inc.'s (PPG) revised electronic submittal entitled the "Remedial Investigation and Feasibility Study Work Plan, Riverside Industrial Park Superfund Site, Newark, New Jersey, Revised: July 18, 2017" (July 2017 RI/FS WP). Pursuant to Paragraph 41, of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study, EPA hereby conditionally approves the July 2017 RI/FS WP. EPA's approval is conditioned upon PPG's acceptance of *all* of the redline changes noted in its July 2017 RI/FS WP electronic submittal to EPA, in addition to the modifications, referenced below, which were previously agreed upon or which provide necessary clarifications, but were not included in PPG's July 2017 RI/FS WP submittal:

- Hexavalent chromium will be added to Footnote A of Table 6-4,
- Footnote B of Table 6-5 needs to be revised for the "existing wells" to read "If well construction logs are available, sampling will occur at the mid-screen interval. Stratified sampling will be conducted with low-flow samples collected every 5 feet of saturated screen length, as appropriate based on field observations and judgment of the field geologist."
- There appears to be a typo on Table 6-6 "Existing Wells" under the PCB column (61 field samples instead of 22). Please add an additional footnote to Table 6-5 and Table 6-6 that is consistent with Work Plan Section 6.1.13 that Phase 1 groundwater sampling will include 8 existing wells plus newly installed monitoring wells. Sample count of 22 (8 existing wells \times 2 events = 16 samples plus 6 sump samples = 22 samples) does not include the newly installed monitoring wells.
- The typo in Section 4.3.2, 4th paragraph will be fixed - "wo" should be "two".
- The following new sentence will be added to Section 6.1.7, 2nd paragraph after the sentence about the borings being terminated at a shallower depth, to reference the temporary well points, "Refer to Section 6.1.10 for soil borings associated with

temporary well points, which will be advanced into the saturated zone.” Also, add cyanide to the list of parameters for lab analysis in this same paragraph.

- The last four sentences on page 6-7 (Section 6.1.9) will be replaced with, “Existing monitoring wells that are determined to be in satisfactory condition will be redeveloped according to the QAPP (Appendix B, SOP-6). If existing wells are determined to be damaged and unable to provide a representative groundwater sample, new monitoring wells will be installed (as appropriate). The existing wells that are determined to be in satisfactory condition, will be sampled following redevelopment in Phase 1 (refer to Section 6.1.13 on sampling details) via low flow per the SOP in QAPP Appendix A.”
- The following new sentence will be added to Section 6.1.10, 3rd paragraph after the sentence about the parameters for lab analysis, to reflect agreements in our June meeting and call, “TWP’s are to provide screening data; consequently, no data validation will be conducted, and field quality control samples will not be collected.” Also, in that previous sentence add cyanide (similar to the previous bullet).
- Add cyanide to the list of parameters in Section 6.1.13, 1st paragraph (see previous bullets).
- Add “including hexavalent chromium and cyanide” to the list of parameters in Section 6.1.14 (see previous bullets).
- The following new sentence will be added to Section 6.1.15, 1st paragraph, following the 1st sentence, “(Note that TWP data will be used as screening data and will not be validated.)”

Now, with regard to PPG’s July 2017, Quality Assurance Project Plan (QAPP) electronic submittal revisions, EPA has decided that rather than hold up the approval of the RI/FS WP, approval of the QAPP will be deferred, so that the required revisions can be fully incorporated before the field sampling program begins. Therefore, please finalize the July 2017 RI/FS WP and submit the final hard and electronic copies, as applicable. This approval starts the clock for initiating mobilization of the field activities.

We appreciate your cooperation and we look forward to continuing to work in this cooperative manner. If you have any questions, feel free to contact me at 212-637-4396.

Sincerely yours,



Elizabeth Butler
Remedial Project Manager
Emergency and Remedial Response Division

cc: M. Sivak, EPA
W. Reilly, EPA